



July 15, 2011

Ex Parte Notice

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Establishing Just and Reasonable Rates for Local Exchange Carriers, WC Docket No. 07-135; Developing a Unified Inter-carrier Compensation Regime, CC Docket 01-92; Rules and Regulations Implementing the Truth in Caller ID Act of 2009, WC Docket No. 11-39

Dear Ms. Dortch:

On Wednesday, July 13, 2011, the undersigned on behalf of the National Telecommunications Cooperative Association, together with Betty Buckley, Executive Vice President of the Washington Independent Telecommunications Association, Dale Merten, Chief Operating Officer of Toledo Telephone Company, and Rick Vitzthum, Controller of Kalama Telephone Company and Tenino Telephone Company (collectively, the “Rural Representatives”) met with Terry Cavanaugh and Margaret Dailey from the Enforcement Bureau, Joseph Levin of the Wireless Telecommunications Bureau, John Healy of the Public Safety and Homeland Security Bureau, and Bill Dever, Randy Clarke, Travis Litman, and Richard Hovey of the Wireline Competition Bureau to discuss continuing concerns with respect to call routing and termination failures and phantom traffic. Messrs. Merten, Vitzthum, Levin, and Hovey attended the meeting by telephone.

The Rural Representatives identified several scenarios that appear to arise in the context of call routing and termination problems: (1) the call never reaches the end office switch of the carrier serving the called party or even the tandem switch to which the end office subtends; (2) the call rings 15 to 16 times for the calling party before ringing for the customer on the receiving end; and (3) the call can be answered, but the called party cannot hear the calling party speaking. The Rural Representatives further discussed their understanding of the role that VoIP gateways used by intermediate service providers and routing tables used by interexchange carriers (“IXCs”) play in this process, and the fact that frequent updates to routing tables often appear to reintroduce problems that may have been resolved several days earlier after significant troubleshooting efforts. The Rural Representatives also discussed how difficult it can be to track down appropriate and/or helpful contacts to obtain trouble resolution within some IXC organizations.

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The Rural Representatives also expressed concern about how phantom traffic might be used as an alternative to the termination of long distance calls in rural America. They explained how even as call routing and termination problems might seem to decrease from time to time, any such decrease often comes with a commensurate increase in the amount of phantom traffic that is terminated via other means.

The Rural Representatives further urged the Commission to adopt strict and clearly defined phantom traffic rules that would require carriers to pass CIC and OCN information, and to clarify the obligations and limitations on insertion of intermediate telephone numbers as substitutes for the true originating number of a call placed by a customer on the PSTN or via any VoIP service (or other platform) that seeks to terminate a call to the PSTN.

Finally, the Washington companies committed to provide to staff additional data relating to the call routing and termination and phantom traffic issues they had experienced, as well as specific proposals and legal justification for the adoption of a rule that would require the passage of CIC and OCN information.

Pursuant to Section 1.1206 of the Commission's rules, a copy of this letter is being filed via ECFS with your office. If you have any questions, please do not hesitate to contact me at (703) 351-2016 or mromano@ntca.org.

Sincerely,

/s/ Michael R. Romano
Michael R. Romano

Senior Vice President - Policy

cc: Terry Cavanaugh
Margaret Dailey
John Healy
Bill Dever
Randy Clarke
Travis Litman
Richard Hovey
Joseph Levin